



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

(217)782-5544

April 3, 1986

Ms. Ann Budich
U.S. Environmental Protection Agency
230 South Dearborn Street
5 HW-13
Chicago, Illinois 60604

Re: Report of Non-Notifier and Non-Filer
Apollo Metal
ILD 005070131

Dear Ms. Budich:

Enclosed is information relating to the Apollo Metal facility, a Non-Notifier and Non-Filer under RCRA. If after followup by this Agency, this Company does not come into compliance, we will refer this matter for enforcement.

Sincerely yours,

Paul R. Jagiello
Attorney
Enforcement Programs

PRJ:mm

Enclosure

cc: Gary King
Glen Savage
Bur Filson (w/enclosure)
Northern Region

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APR 07 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V



217/782-6761

Refer to: 031E005151 -- Cook County
Apollo Metal
ILE005070131

COMPLIANCE INQUIRY LETTER

Certified # P 577-58675

April 7, 1986

Apollo Metal
Attn: Mr. Shamasco
11500 W. King Street
Franklin Park, IL 60131

Dear Mr. Shamasco:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 722, Subparts B, C, D and E and 35 Ill. Adm. Code Part 725, Subparts B, C, D, E and I and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on March 7, 1986. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response should be sent to the following:

Mark A. Nancy, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

In addition, include in your response two copies of your waste analysis plan, waste analyses, inspection schedule, inspection log, description of the type and amount of personnel training, job titles, job descriptions, training records to document training, proof of arrangements attempted with local emergency response organizations, contingency plan, facility and generator annual reports for 1983, 1984 and 1985, closure plan, cost estimate for facility closure, manifests for wastes shipped off-site in 1983, 1984 and 1985, subsequent notification for hazardous waste storage (USEPA Form 8700-12) and a Part A permit application (USEPA Form 3510-1 and 3510-3).




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Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Gino Bruni at 312/345-9780.

Sincerely,


Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:BF:GB:mgs0782f/12-13

cc: Division File
Northern Region
Don Gimbel
Gary King
Richelle Tebrugge



Attachment A

Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

1. Without a RCRA permit for the HWM (hazardous waste management) facility; or
2. In violation of any condition imposed by a RCRA permit.

You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): You are conducting hazardous waste storage without a RCRA permit.

Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing HWM facility must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

- a. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725.
- b. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725.

You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason(s): You have not submitted Part A of the permit application.

35 Ill. Adm. Code 722.140(a) requires the generator to keep a copy of each manifest signed in accordance with Section 722.123(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. You are in apparent violation of this Section in that no manifests were available during the inspection.

35 Ill. Adm. Code 722.140(b) requires the generator to keep a copy of each Annual Report and any Exception Report(s) for a period of at least three years from the due date. You are in apparent violation of this Section in that no annual reports were available during the inspection.

35 Ill. Adm. Code 722.140(c) requires the generator to keep records of any test results, waste analyses or other determinations made in accordance with Section 722.111 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal facility. You are in apparent violation of this Section in that no records of test results were available during the inspection.



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Pursuant to 35 Ill. Adm. Code 725.113(a), the owner or operator is required to conduct a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage. You are in apparent violation of 35 Ill. Adm. Code 725.113(a) for the following reason(s): No analyses were conducted prior to storage.

Pursuant to 35 Ill. Adm. Code 725.113(b), the owner or operator must have on file at the facility a detailed written waste analysis plan describing the procedures to be used to compile data required under Section 725.113(a). You are in apparent violation of 35 Ill. Adm. Code 725.113(b) since no such plan was present at the site on the date of the inspection.

Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator must inspect his facility for malfunctions and deterioration, operator errors and discharges that may be causing or may lead to a release to the environment or a threat to human health. You are in apparent violation of 35 Ill. Adm. Code 725.115(a) in that the required inspections are not being made.

Pursuant to 35 Ill. Adm. Code 725.115(b), the owner or operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. This schedule must be kept at the facility and must identify the types of problems which are to be looked for during the inspection. The schedule should allow for daily inspection of areas subject to spills, when those areas are in use. You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason(s): No inspection schedule was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years. You are in apparent violation of 35 Ill. Adm. Code 725.115(d) for the following reason(s): No inspection log or summary was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:

- a. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- b. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;



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- d. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that item(s) a, b, c and d above were not maintained at the facility.

Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies. You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason(s): No evidence that facility personnel had completed the required training was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.116(c), facility personnel must take part in an annual review of the initial training required in paragraph (a) of this Section. You are in apparent violation of this Section in that facility personnel have not received an annual review of the initial training.

Pursuant to 35 Ill. Adm. Code 725.117(a), the owner or operator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste. You are in apparent violation of 35 Ill. Adm. Code 725.117(a) for the following reason(s): No "No Smoking" signs were observed during the inspection. No evidence that precautions are being taken to prevent accidental ignition or reaction of ignitable or reactive wastes were observed during the inspection.

Pursuant to 35 Ill. Adm. Code 725.132, all facilities must be equipped with internal communications or alarm systems, a device to summon emergency assistance from local authorities, portable fire extinguishers, and fire spill control and decontamination equipment, and water at adequate volume and pressure unless none of the hazards posed by waste handled at the facility would require the specified equipment of this Section. You are in apparent violation of 35 Ill. Adm. Code 725.132 for the following reason(s): No decontamination equipment was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.133, all facility communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. You are in apparent violation of this Section for the following reason(s): No evidence that fire protection and spill control equipment are being tested and maintained was observed during the inspection.



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Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason(s): No evidence that such arrangements had been attempted was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 725.151(a) for the following reason(s): No contingency plan was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:

- a) Maintained at the facility;
- b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams.

You are in apparent violation of 35 Ill. Adm. Code 725.153 in that condition(s) a and b above was/were not complied with.

Pursuant to 35 Ill. Adm. Code 725.155, at all times there must be at least one emergency coordinator either on the facility premises or on call. You are in apparent violation of 35 Ill. Adm. Code 725.155 for the following reason: No emergency coordinator had been identified who would be at the facility or on call.

Pursuant to 35 Ill. Adm. Code 725.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:

- a. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173;
- b. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers;
- c. Records and results of waste analyses and trial tests;
- d. Summary reports and details of all incidents that require implementation of the contingency plan.



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- e. Records and results of inspections;
- f. Monitoring, testing and other analytical data;
- g. All closure cost estimates and, for disposal facilities, all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 in that the operating record did not include item(s) a, b, c, d, e, f or g above.

Pursuant to 35 Ill. Adm. Code 725.175, the owner or operator must prepare and submit a single copy of an annual report to the director by March 1 of each year. You are in apparent violation of 35 Ill. Adm. Code 725.175 for the following reason(s): Annual reports for 1983, 1984 and 1985 were not available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

- a. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;
- b. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
- c. A description of the steps needed to decontaminate facility equipment and surrounding soil if necessary;
- d. An estimate of the expected year of closure and a schedule for final closure;
- e. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): No closure plan was available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.212(c), the owner or operator must submit his closure plan to the Director at least 180 days before the date he expects to begin closure. You are in apparent violation of 35 Ill. Adm. Code 725.212(c) for the following reason: You did not submit your closure plan as required.



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Pursuant to 35 Ill. Adm. Code 725.242(d), the owner or operator must keep the following at the facility during the operating life of the facility: The latest closure cost estimate prepared in accordance with Sections 725.242(a) and (c) and, when this estimate has been adjusted in accordance with Section 725.242(b), the latest adjusted closure cost estimate. You are in apparent violation of 35 Ill. Adm. Code 725.242(d) for the following reason(s): Required closure cost estimates were not available during the inspection.

Pursuant to 35 Ill. Adm. Code 725.273(a), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. You are in apparent violation of 35 Ill. Adm. Code 725.273(a) for the following reason: Containers were observed stored open during the inspection.

Pursuant to 35 Ill. Adm. Code 725.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 725.274 for the following reason(s): No evidence that the required inspections are being conducted was observed during the inspection.

BF:mgs0782f/14-19

NON-NOTIFICATION AND NON-FILER DISPOSITION FORM

1. Non-Notifier ☒ Non-Filer ☒
2. U.S.E.P.A. ID Number for Non-Filers IL D005070131
3. Name of Facility: APOLLO METAL
- Facility Mailing Address: 11500 W. KING ST.
- FRANKLIN PARK IL 60131
City or Town State Zip Code
4. Location of Facility: 6657 S. DAK PARK AVE
- BEDFORD PARK IL 60638
City or Town State Zip Code
5. Facility Contact: BILL SHAMASCO
Name and Title
- Phone Number: 312-458-4599 OR 312-767-6161
Area Code and Number
6. Type of Hazardous Waste Activity if Determined:
- ☒ Generation ☐ Transportation
- ☒ Treat/Store/Dispose (Circle Applicable Activities)
- ☐ Underground Injection
7. Description of State Follow-up Action (Including Name of State Assignee, File Data Reviewed, Person(s) Contacted by State, Date(s) and Type of Contact(s), and Information Obtained): GINO BRUNI IEPA/EPS

8. List of Significant Apparent Violations: NON-NOTIFIER
NON-FILER

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9. List of Supporting Documents Attached: ISS INSPECTION

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TO BE COMPLETED BY ENFORCEMENT SECTION

10. Type of Enforcement Action Recommended: No enforcement action is recommended at the present time. If the facility does not achieve compliance upon agency follow-up, the facility will be referred.

11. Disposition Form Signed and Dated by State Enforcement Section:

4/13/86Paul B. Tagliello

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

I. General Information

USEPA Number: ELD 005070131 IEPA Number: 0316005151

LDF Facility: YES ☒ NO ☐ Notified As: GEN Regulated As: GEN/TSD

(A) Facility Name: APOLLO METAL

(B) Street: 6657 S. Oak Park Ave.

(C) City: Bedford Park (D) State: IL (E) Zip Code: 60638

(F) Phone: 312/458-4599 (G) County: Cook

(H) Operator: Apollo Metal

(I) Street: 6657 S. Oak Park Ave.

(J) City: Bedford Park (K) State: IL (L) Zip Code: 60638

(M) Phone: 312/458-4599 (N) County: Cook

(O) Owner: Apollo Metal

(P) Street: 11500 W. King Street

(Q) City: Franklin Park (R) State: IL (S) Zip Code: 60131

(T) Phone: 312/458-4599 or 312/767-6161 (U) County: Cook

Region: N (V) Date of Inspection: 3 / 7 / 86 (W) Time: (From) 10:30am (To) 1:00pm

Type of Inspection: ☒ ISS ☐ RECORD REVIEW ☐ SAMPLING ☐ CITIZEN COMPLAINT
☐ CLOSED ☐ WITHDRAWAL ☐ OTHER ☐ PART B
F/U / / (Date of Initial Inspection)

(X) Weather Conditions: Sunny 10° F

Area	Section	Class I	Class II
OTH	725.113	✓	
OTH	725.115		✓
OTH	725.116	✓	
OTH	725.117	✓	
OTH	725.132	✓	
OTH	725.133	✓	
OTH	725.137		✓
OTH	725.151	✓	
OTH	725.153		✓
OTH	725.155		✓
OTH	725.173		✓
OTH	725.175		✓
C/P	725.212	✓	
FIN	725.242	✓	
OTH	725.273	✓	
OTH	725.274	✓	
OTH	722.140		✓
OTH	703.121	✓	
OTH	703.150	✓	

(AA) Preparer Information

Name

Gino Brunni

Agency/Title

IEPA / EPS

Telephone

312/345-9780

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TOTAL Class I's & II's

13 7

(Y) Person(s) Interviewed

JOHN WAIGAND

Title

Telephone

312-458-4599 OR
767-6161

(Z) Inspection Participants

GINO BRUNI

Agency/Title

IEPA / EPS

Telephone

312-345-9280

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)

Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K, F
T02	<input type="checkbox"/>	treatment in surface impoundment	K, F
D83	<input type="checkbox"/>	disposal in surface impoundment	K, F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M, F
D80	<input type="checkbox"/>	disposal in landfill	N, F
T03	<input type="checkbox"/>	treatment by incineration	O, P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other Activities

GENERATOR

☒

APPENDIX

GN

TRANSPORTER

☐

APPENDIX

TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

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Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 725 Subpart E)

YES NO NI Remarks

** 1. Use of Manifest System

a. Does the facility follow the procedures listed in §725.171 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

N/A FACILITY IS
NOT DISPOSAL SITE.

b. Are records of past shipments retained for 3 years?

** 2. Does the owner or operator meet requirements regarding manifest discrepancies?

** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

3. Operating Record

a. Does the owner or operator maintain an operating record as required in 725.178?

✓

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

✓

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓

***iii. A map or diagram of each cell or disposal area

*** only applies to disposal facilities

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YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — ✓ N/A

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ✓ —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

— ✓ —

vi. All closure and post closure costs as applicable?

— ✓ —

4. Availability of Records

Are all facility records required under 35 Ill. Adm. Code 725 available for inspection?

— ✓ —

5. **Unmanifested Waste Reports

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 or 35 Ill. Adm. Code 722.120 without a manifest or shipping paper?

— — N/A DOES NOT

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

RECEIVE HAZARDOUS WASTE FROM OFF-SITE

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 725 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with §725.151 and 725.156 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

— ✓ —

NO CONTINGENCY
PLAN AVAILABLE AT
SITE

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §725.137?

— ✓ —

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

— ✓ —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— ✓ —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— ✓ —

2. Are copies of the Contingency Plan available at the site and local emergency organizations?

— ✓ —

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	YES	NO	NI	Remarks
3. Emergency Coordinator				
a. Is the facility Emergency Coordinator identified?	—	—	✓	FACILITY DID NOT HAVE
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	—	—	—	A CONTINGENCY PLAN AVAILABLE AT THE SITE.
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	—	—	✓	
4. Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 725.156?				
	—	—	✓	NO EVIDENCE OF EMERGENCY REQUIRING IMPLEMENTATION OF CONTINGENCY PLAN

Section C: PREPAREDNESS AND PREVENTION: (Part 725 Subpart C)

1. Maintenance and Operation of Facility:

YES NO NI Remarks

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

— ☒ —

2. If required, does the facility have the following equipment:

a. Internal communications or alarm systems?

— — ☒

FACILITY STOPPED OPERATION IN 1982

b. Telephone or 2-way radios at the scene of operations?

— — ☒

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

— ☒ —

REQUIRE DECONTAMINATION EQUIPMENT NOT AVAILABLE.

Indicate the volume of water and/or foam available for fire control:

CITY WATER

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

— ☒ —

NO EVIDENCE OF SUCH PROCEDURES

b. Is emergency equipment maintained in operable condition?

— ☒ —

NO EVIDENCE OF ANY MAINTENANCE.

4. Has owner or operator provided immediate access to internal alarms? (if needed)

— — ☒

FACILITY NOT OPERATING.

5. Is there adequate aisle space for unobstructed movement?

☒ — —

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

— ☒ —

Section C: PREPAREDNESS AND PREVENTION: (Part 725 Subpart C)

1. Maintenance and Operation of Facility:

YES NO NI Remarks

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

— ☒ —

2. If required, does the facility have the following equipment:

a. Internal communications or alarm systems?

— — ☒

FACILITY STOPPED OPERATION IN 1982

b. Telephone or 2-way radios at the scene of operations?

— — ☒

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

— ☒ —

REQUIRE DECONTAMINATION EQUIPMENT NOT AVAILABLE.

Indicate the volume of water and/or foam available for fire control:

CITY WATER

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

— ☒ —

NO EVIDENCE OF SUCH PROCEDURES

b. Is emergency equipment maintained in operable condition?

— ☒ —

NO EVIDENCE OF ANY MAINTENANCE.

4. Has owner or operator provided immediate access to internal alarms? (if needed)

— — ☒

FACILITY NOT OPERATING.

5. Is there adequate aisle space for unobstructed movement?

☒ — —

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

— ☒ —

	YES	NO	NI	Remarks
c. Description of training?	—	—	✓	NO PERSONNEL TRAINING RECORDS
d. Records of training?	—	—	—	
e. Did facility personnel receive the required training by 5-19-81?	—	—	—	
f. Do new personnel receive required training within six months?	—	—	—	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	—	—	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				IGNITABLE & RE- ACTIVE WASTES
a. Special handling?	—	✓	—	NO EVIDENCE THAT
b. No smoking signs?	—	✓	—	SPECIAL HANDLING
c. Separation and protection from ignition sources?	—	✓	—	REQUIREMENTS AND PROTECTION FROM IGNITION SOURCES ARE BEING AC- COMPLISHED.

Section B: GENERAL FACILITY STANDARDS: (Part 725 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding:

a. Receipt of hazardous waste from a foreign source? — ✓ —

b. Facility expansion? — ✓ —

c. Change of owner or operator? — ✓ —

FACILITY DOES NOT RECEIVE HAZ. WASTE FROM A FOREIGN SOURCE. NO FACILITY EXPANSION STOPPED OPERATION IN OCT. OF 1982. BUILDINGS HAVE NOT BEEN SOLD

2. General Waste Analysis:

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? — ✓ —

b. Does the owner or operator have a detailed waste analysis plan on file at the facility? — ✓ —

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? — — ✓

DOES NOT RECEIVE HAZ. WASTE FROM OFF-SITE.

3. Security - Do security measures include: (if applicable)

a. 24-Hour surveillance? — ✓ —

b. i. Artificial or natural barrier around facility? ✓ — —

and ii. Controlled entry? ✓ — —

c. Danger sign(s) at entrance? ✓ — —

4. Owner or operator inspections:

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? — ✓ —

NO EVIDENCE OF SUCH INSPECTIONS.

*Not Inspected

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	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?		<input checked="" type="checkbox"/>		
c. If so, does the schedule address the inspection of the following items:			<input checked="" type="checkbox"/>	NO INSPECTION SCHEDULE
i. monitoring equipment?				
ii. safety and emergency equipment?				
iii. security devices?				
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?				
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?				
d. Are areas subject to spills inspected daily when in use?		<input checked="" type="checkbox"/>		NO EVIDENCE OF SUCH INSPECTIONS
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?		<input checked="" type="checkbox"/>		
f. Does the inspection log contain the following information:			<input checked="" type="checkbox"/>	NO INSPECTION LOG
i. the date and time of the inspection?				
ii. the name of the inspector?				
iii. a notation of the observations made?				
iv. the date and nature of any repairs or remedial actions?				
5. Do personnel training records include:		<input checked="" type="checkbox"/>		NO PERSONNEL TRAINING RECORD
a. Job titles?			<input checked="" type="checkbox"/>	
b. Job descriptions?				

Section G/H - CLOSURE/POST CLOSURE AND FINANCIAL (Part 725, Subparts G+H)

	<u>YES</u>	<u>NO</u>	<u>NI</u>	<u>Remarks</u>
1. Closure				
a. Is the facility closure plan available for inspection?	_____	<u>✓</u>	_____	_____
b. Has the closure plan been submitted to the Director?	_____	<u>✓</u>	_____	_____
*2. Post Closure: Is the post closure plan available for inspection?	_____	_____	<u>✓</u>	<u>N/A</u>
3. Has the facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212?	_____	<u>✓</u>	_____	_____
*4. Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?	_____	_____	<u>✓</u>	<u>N/A</u>

* Applies only to disposal facilities.

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Section I - USE AND MANGEMENT OF CONTAINERS (Part 725, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4 DRUMS OF LIQUID CHADMA WASTE ARE STORED WITHOUT LIDS.
5. Are containers inspected weekly for leaks and defects.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NO EVIDENCE OF SUCH INSPECTIONS.
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1610 ARE STORED INSIDE A SEPERATE BUILDING.
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 35 Ill. Adm. Code 725.117(b) apply).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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Section C: PRE-TRANSPORT REQUIREMENTS (Part 722, Subpart C)

	YES	NO	NI	REMARKS
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	_____	_____	<input checked="" type="checkbox"/>	<u>NO WASTE</u> <u>READY FOR</u> <u>MOVEMENT</u> <u>OFF SITE</u> <u>AT TIME OF</u> <u>INSPECTION</u>
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	_____	_____	<input checked="" type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste?	_____	_____	<input checked="" type="checkbox"/>	
4. On-site accumulation of generated wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [725.101(b)] or (B) in accordance with 35 Ill. Adm. Code 722.134 [See 725.101(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations:				
a. Is each container clearly marked with the start of accumulation date?	_____	_____	<input checked="" type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	_____	_____	<input checked="" type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	_____	_____	<input checked="" type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	_____	_____	<input checked="" type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 722, Subpart D)

	YES	NO	NI	REMARKS
1. Are all tests results and analyses needed for hazardous waste determinations retained for at least three years?	_____	<input checked="" type="checkbox"/>	_____	

Section E: INTERNATIONAL SHIPMENTS (Part 722, Subpart E)

1. Has the installation imported or exported Hazardous Waste?	_____	<input checked="" type="checkbox"/>	_____	
(If answered Yes, complete the following as applicable).				
a. Exporting Hazardous Waste; has a generator:				

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 722, Subpart B)

YES NO NI Remarks

- | | | | | |
|---|-----|----|----|---|
| (1) Does the operator have copies of the manifest available for review? | YES | NO | NI | Remarks |
| | | ✓ | | NO MANIFESTS WERE AVAILABLE AT THE SITE |
| (2) Manifests for shipments in past <u> </u> months were examined. The approx. number of manifests shipments during that period were <u> </u> . | | | | |
| (3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). | | | | |
| a. Manifest document number? | | | ✓ | NO MANIFESTS |
| b. Name, mailing address, telephone number, and EPA ID number of Generator | | | | |
| c. Name and EPA ID Number of Transporter(s)? | | | | |
| d. Name, address, and EPA ID Number Designated permitted facility and alternate facility? | | | | |
| e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | | | | RECEIVED |
| f. The total quantity of waste(s) and the type and number of containers loaded? | | | | MAR 19 1986 |
| g. Required certification? | | | | EPA-DLPC |
| h. Required signatures? | | | ✓ | |
| (4) Reportable exceptions - <u>NOT INSPECTED</u> | | | | |
| a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u> </u> | | | | |
| b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (35 Ill. Adm. Code 722.142) to the Regional Administrator. <u> </u> | | | | |

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NARRATIVE

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ON MARCH 7, 1986 THIS AGENCY RECEIVED AN ANONYMOUS COMPLAINT THAT APOLLO METAL WAS DUMPING CYANIDE WASTE INTO THE SEWER. THAT SAME DAY I WENT OUT TO APOLLO METAL TO INVESTIGATE THIS COMPLAINT. APOLLO METAL WAS NOT DUMPING CYANIDE WASTE INTO THE SEWER. APOLLO METAL IS A NICKEL, CHROME, & COPPER PLATER. APOLLO METAL STOPPED OPERATION IN OCTOBER OF 1982. THEY ARE STORING APPROXIMATELY 19 DRUMS OF NICKEL WASTE, 27 DRUMS OF CYANIDE WASTE, 9 DRUMS OF CLEANER (CAUSTIC), 12 DRUMS OF CHROME WASTE, AND 28 CONTAINERS OF FLAMMABLE WASTES AT THIS FACILITY. AT THE PRESENT TIME MR. WAIGAND, MR. SHAMASCO, OR TWO MAINTENANCE PEOPLE WILL BE AT THE FACILITY APPROXIMATELY THREE DAYS A WEEK. MR. WAIGAND INFORMED ME THAT THEY ARE CLEANING THE BUILDING, FIXING LEAKING PIPES, AND REMOVING SOME OF THE EQUIPMENT. MR. SHAMASCO IS IN CHARGE OF THE DISPOSAL OF THE HAZARDOUS WASTES IN THE FACILITY. MR. SHAMASCO CAN BE REACHED AT THE FRANKLIN PARK FACILITY 767-6161 OR AT THE BEDFORD PARK FACILITY 458-4599.

THE FOLLOWING ARE VIOLATIONS: 703.150 DID NOT SUBMIT PART A
703.121 OPERATING A HWM FACILITY WITHOUT RCRA PERMIT. 722.140
NO ANNUAL REPORT OR EXCEPTION REPORT. 725.274 REQUIRED INSPECTIONS WAS NOT CONDUCTED BY THE OPERATOR.
725.273 CONTAINERS WERE OBSERVED STORED OPEN. 725.242
NO CLOSURE COST ESTIMATE. 725.212 NO CLOSURE PLAN
725.173 NO OPERATING RECORD. 725.155 NO EMERGENCY
COORDINATOR. 725.153 NO CONTINGENCY PLAN & THE CONTINGENCY
PLAN WAS NOT SUBMITTED TO LOCAL AUTHORITIES.

NARRATIVE

725.151 - NO CONTINGENCY PLAN 725.137 NO ARRANGEMENTS
WERE MADE WITH LOCAL AUTHORITIES 725.133 NO FIRE PROTECTION
SPILL CONTROL EQUIPMENT, 2 DECONTAMINATION EQUIPMENT WAS
AVAILABLE. 725.132 NO DECONTAMINATION EQUIPMENT
725.117 NO SMOCKING SIGNS WERE OBSERVED DURING THE INSPECTION.
NO EVIDENCE THAT PRECAUTIONS ARE BEING TAKEN TO PREVENT ACCIDENTAL
IGNITION OR REACTION OF IGNITABLE OR REACTIVE WASTES WERE
OBSERVED DURING THE INSPECTION. 725.116 PERSONNEL DID
NOT RECEIVE ANNUAL REVIEW OF INITIAL TRAINING.
725.115 NO INSPECTION SCHEDULE 725.113 NO ANALYSIS
WERE CONDUCTED PRIOR TO STORAGE.

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